

ENVISAGE LAW

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July 11, 2025

VIA ECF

Honorable P. Kevin Castel, U.S.D.J.
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

**Re: Episode 3 d/b/a/ Strivepath v. Advantage College Planning, et al. Civil Action No.
1:25-cv-03745-PKC**

Dear Judge Castel:

This firm represents the Defendants herein. Pursuant to Section 1.B of Your Honor's Individual Practices in Civil Cases, please accept this as a request for Defendants' counsel to attend and participate in the Initial Pretrial Conference by video or telephone.

Attending in person requires a full day of travel as undersigned counsel resides in North Carolina, where Defendants reside. The associated costs for lead counsel's travel likely exceed the value of the case. The burden is particularly undue where, as here, there is no fair or reasonable basis for a dispute between North Carolina and California companies being filed in your court. Further, undersigned counsel has now purchased airline tickets for the first two scheduled initial pretrial conferences, the first of which was not refundable and had already moved all obligations off July 16, to include moving them onto July 17, to accommodate the prior rescheduling.

Should it be Your Honor's policy to deny such requests by out of state counsel for initial pretrial conferences, Defendants' counsel will, of course, again adjust their travel plans as necessary to appear in person on Thursday, July 17, 2025.

We appreciate the Your Honor's consideration of this request and are prepared to comply with whatever appearance method Your Honor deems appropriate.

Respectfully submitted,

ENVISAGE LAW

By: /s/Anthony J. Biller
Anthony J. Biller

Cc: Brian A. Bloom, Esq. (via ECF)
Ronald A. Berutti, Esq. (via ECF)